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19 **UNITED STATES DISTRICT COURT**  
20 **NORTHERN DISTRICT OF CALIFORNIA**  
21

22 DIGITAL CONTENT PROTECTION, LLC, and  
23 WARNER BROS. ENTERTAINMENT INC.,

24 Plaintiffs,

25 v.

26 ACE DEAL INC.,

27 Defendant.  
28

Case No.: 4:15-cv-6341-DMR

**STIPULATION TO CONTINUE CASE  
MANAGEMENT CONFERENCE AND  
RELATED DEADLINES; DECLARATION  
OF SUSAN D. FAHRINGER; [PROPOSED]  
ORDER**

Current Date: March 30, 2016

Proposed Date: April 27, 2016

STIPULATION TO CONTINUE INITIAL  
CASE MANAGEMENT CONFERENCE AND  
RELATED DEADLINES

Case No. 4:15-cv-6341-DMR

1 **STIPULATION**

2 Pursuant to Local Civil Rules 6-2, 7-12, and 16-2(d), plaintiffs Digital Content Protection,  
3 LLC, and Warner Bros. Entertainment Inc. ("Plaintiffs") and defendant Ace Deal Inc. ("Defendant"),  
4 by and through their respective counsel, stipulate and agree as follows:

5 WHEREAS, the Complaint was filed on December 31, 2015, and personally served on  
6 Defendants on January 4, 2016;

7 WHEREAS, the Initial Case Management Conference is currently scheduled for March 30,  
8 2016 at 1:30 p.m.;

9 WHEREAS, the parties are actively engaged in settlement discussions and are hopeful that  
10 the case can be resolved in the near future;

11 WHEREAS, lead counsel for Plaintiffs is unavailable on March 30, 2016;

12 WHEREAS, the parties agree that, in the interest of justice and in an effort to enhance judicial  
13 efficiency and preserve resources, the Case Management Conference should be continued to April 27,  
14 2016, or a date thereafter on which the Court is available, and all related deadlines should be adjusted  
15 accordingly;

16 WHEREAS, the only previous time modifications in this case have been stipulated extensions  
17 of Defendant's deadline to respond to the Complaint; and

18 WHEREAS, the parties agree that continuing the Case Management Conference to April 27,  
19 2016, will not impact the schedule of the case, as no trial date or other deadlines have been set.

20 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED that:

- 21 1. The Initial Case Management Conference is continued to April 27, 2016;
- 22 2. The last day to file a Rule 26(f) Report, complete initial disclosures or state objection  
23 in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint  
24 Case Management Statement is continued to April 20, 2016.
- 25 3. The last day to meet and confer regarding initial disclosures, early settlement, ADR  
26 process selection, and discovery plan; file ADR Certification signed by Parties and Counsel; and file

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1 either Stipulation to ADR Process or Notice of Need for ADR Phone Conference is continued to  
2 April 6, 2016.

3  
4  
5 Dated: March 4, 2016

Respectfully submitted,

PERKINS COIE LLP

6  
7 By: /s/ Susan D. Fahringer\*

8 Susan D. Fahringer  
9 Ryan Spear  
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Telephone: 206.359.8000

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12 505 Howard Street, Suite 1000  
San Francisco, CA 94105  
Telephone: 415.344.7000

13 Attorneys for Plaintiffs Digital Content  
14 Protection, LLC and Warner Bros. Entertainment  
15 Inc.

16 Dated: March 4, 2016

INTELLECTUAL PROPERTY LAW GROUP LLP

17  
18 By: /s/ Bonnie J. Wolf

19 Otto O. Lee  
20 Kevin Viau  
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23 Attorneys for Defendant Ace Deal Inc.

24 \* Pursuant to Local Rule 5-1(i)(3), filing counsel attests that all other signatories listed, on whose  
25 behalf the filing is submitted, concur in the content and have authorized the filing.  
26  
27  
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1 **DECLARATION**

2 I, Susan D. Fahringer, declare as follows:

- 3 1. I am an attorney licensed to practice law before the courts of the State of California and this  
4 Court. I am a Partner at the law firm of Perkins Coie LLP and the lead attorney for plaintiffs  
5 Digital Content Protection, LLC, and Warner Bros. Entertainment Inc. ("Plaintiffs") in this  
6 matter. I submit this declaration in support of the parties' Stipulation to Continue Case  
7 Management Conference and Related Deadlines. I have personal knowledge of the facts set  
8 forth herein and, if called to testify as a witness, could and would do so under oath.
- 9 2. I am unable to attend the Initial Case Management Conference scheduled for March 30, 2016,  
10 due to a preplanned trip out of the country.
- 11 3. The parties are actively engaged in settlement discussions and are hopeful that the case can be  
12 resolved.
- 13 4. The parties have met and conferred, and agree that in the interest of justice and in an effort to  
14 enhance judicial efficiency and preserve resources, the Case Management Conference should  
15 be continued to April 27, 2016, and all related deadlines adjusted accordingly.
- 16 5. The only previous time modifications in this case have been stipulated extensions of  
17 Defendant's deadline to respond to the Complaint. The first Stipulation was filed on January  
18 25, 2016, and extended Defendant's deadline to respond to the Complaint from January 25,  
19 2016, to February 15, 2016 [Dkt. 13]. The second Stipulation was filed on February 12, 2016,  
20 and further extended Defendant's deadline to respond to the Complaint to March 7, 2016  
21 [Dkt. 17]. The most recent Stipulation was filed on March 3, 2016, and extended Defendant's  
22 deadline to respond to the Complaint to March 21, 2016 [Dkt. 19].
- 23 6. The parties agree that continuing the Case Management Conference to April 27, 2016, and  
24 adjusting related deadlines accordingly will not otherwise impact the schedule of the case, as  
25 so trial date or other deadlines have been set.
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1 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
2 and correct. Executed this 4th day of March, 2016, at Seattle, Washington.

3 /s/ Susan D. Fahringer  
4 Susan D. Fahringer  
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1 **[PROPOSED] ORDER**

2 Based on the parties' Stipulation and the supporting Declaration of Susan D. Fahringer, and  
3 good cause appearing, the Initial Case Management Conference is continued and related deadlines  
4 are adjusted as follows:

- 5 1. The Initial Case Management Conference will take place on April 27, 2016;  
6 2. The last day to file a Rule 26(f) Report, complete initial disclosures or state objection  
7 in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint  
8 Case Management Statement is April 20, 2016.  
9 3. The last day to meet and confer regarding initial disclosures, early settlement, ADR  
10 process selection, and discovery plan; file ADR Certification signed by Parties and Counsel; and file  
11 either Stipulation to ADR Process or Notice of Need for ADR Phone Conference is April 6, 2016.

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13 IT IS SO ORDERED.

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15 DATED: \_\_\_\_\_

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16 Hon. Donna M. Ryu  
17 United States Magistrate Judge  
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